

1 Michael G. Marderosian, No. 77296
2 Heather S. Cohen, No. 263093
3 MARDEROSIAN & COHEN
4 1260 Fulton Street
5 Fresno, CA 93721
6 Telephone: (559) 441-7991
7 Facsimile: (559) 441-8170

8 Virginia Gennaro, No. 138877
9 City Attorney
10 CITY OF BAKERSFIELD
11 1501 Truxtun Avenue
12 Bakersfield, CA 93301
13 Telephone: (661) 326-3721
14 Facsimile: (661) 852-2020

15 Attorneys for: Defendants CITY OF BAKERSFIELD, BAKERSFIELD POLICE
16 DEPARTMENT, OFFICER CHAD GARRETT and OFFICER RICK WIMBISH

17 UNITED STATES DISTRICT COURT
18 EASTERN DISTRICT OF CALIFORNIA

19 THE ESTATE OF JASON ALDERMAN;) Case No. 1:16-CV-00994-DAD-JLT
20 JUDY EDENS, an individual, A.K., by and)
21 through his guardian *ad litem* NENA) **STIPULATION TO FURTHER EXTEND**
22 CHAVEZ; and S.A., by and through his) **DEADLINE TO DISMISS; [PROPOSED]**
23 guardian *ad litem* STEPHANIE ELLIOTT,) **ORDER THEREON**
24)
25 Plaintiffs,)
26)
27 vs.)
28)
29 CITY OF BAKERSFIELD;)
30 BAKERSFIELD POLICE DEPARTMENT;)
31 OFFICER CHAD GARRETT, an individual;)
32 OFFICER RICK WIMBISH, an individual;)
33 and DOES 1 to 50,)
34)
35 Defendants.)
36)
37)
38)

1 Pursuant to the Court's Order [Dkt. No. 83], the Parties were directed to file a dismissal of the
2 entire action by October 10, 2018.

3 On October 10, 2018, the Parties filed a Stipulation to Extend the Deadline to Dismiss [Dkt. No.
4 84] on the grounds that due to extenuating circumstances, Plaintiffs' counsel had not yet been able to
5 obtain the signed Release and submit the Petitions for Approval of Minors' Compromises.

6 On October 12, 2018, the Court granted the Parties' Stipulation and issued its Order Granting
7 Stipulation to Extend Deadline to File Dispositional Documents extending the deadline to December 10,
8 2018.

9 At the time the Parties filed their Stipulation on October 10, 2018, Plaintiffs' counsel believed that
10 they would be able to complete the settlement papers within 60 days. However, the attorney working on
11 the matter is no longer with Geragos & Geragos and another attorney is now been assigned to complete
12 the settlement documents. Although Plaintiffs' counsel believes they may be able to obtain the signed
13 Release papers in the coming weeks, additional time is needed in order to complete all of the dispositional
14 papers, including the Petitions for Minors' Compromises.

15 The Parties therefore request that this Court further extend the deadline to dismiss this matter by
16 45 days (January 24, 2019) to allow Plaintiffs' counsel to obtain the fully executed Release and seek the
17 Court's approval of the Petitions for Minors' Compromises.

18 Dated: December 4, 2018.

MARDEROSIAN & COHEN

/s/ Heather S. Cohen

19 By: _____

20 Heather S. Cohen,
21 Attorneys for Defendants
above-named.

22 Dated: December 4, 2018

GERAGOS & GERAGOS

/s/ Marcus Petoyan

24 By: _____

25 Marcus Petoyan,
26 Attorneys for Plaintiffs
27 above-named.
28

1 **ORDER**

2 Pursuant to the Stipulation of the parties and good cause appearing therefor,

3 IT IS HEREBY ORDERED that deadline to dismiss this action is hereby extended by 45 days, up
4 to and including January 24, 2019.

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6 IT IS SO ORDERED.

7 Dated: December 4, 2018

/s/ Jennifer L. Thurston
8 UNITED STATES MAGISTRATE JUDGE

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